

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

UNITED STATES OF AMERICA, §
§
§
§
v. § **No. 4:17-cr-00175-Y-1**
§
Annette Ward, Defendant §

MOTION FOR EXTENSION OF TIME
TO RESPOND TO THE PRE-SENTENCE REPORT

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES the Defendant, by and through counsel of record, and moves for an extension of time for her responses to the presentence investigation report (PSR) in this case and would show the following:

I.

The PSR was revealed on December 20, 2017. The court's scheduling order currently requires that the PSR responses be filed on January 3, 2018. In light of the recent winter holidays, while undersigned Counsel has shared the PSR with Defendant, Counsel has not been able to meet with Defendant to review the PSR. Counsel will return to work on January 4, 2018, and childcare for her three children (which ended December 19, 2017) will resume on that same date, later this week. Counsel requests time to arrange a meeting with Defendant to review the PSR and formulate responses to the same.

WHEREFORE, PREMISES CONSIDERED, Defendant requests the deadline for responses of the PSR be extended for 14 days or more.

Respectfully submitted,

/s/ Erin Hendricks
Erin Hendricks
State Bar of Texas Card No. 24036753
8150 N. Central Expressway, Ste. M2070
Dallas, Texas 75206
214.380.4566
Attorney for Defendant Annette Ward

CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed the foregoing DEFENDANT'S MOTION FOR EXTENSION TO RESPOND TO THE PRESENTENCE REPORT with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the Assistant United States Attorney on this case.

/s/ Erin Hendricks
Erin Hendricks
Attorney for Defendant Annette Ward

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred via electronic mail with Assistant United States Attorney, Mr. Smith, on and before today's date, regarding the filing of this motion. I have also conference with United

State Probation officer Mr. Kleven. Neither gentleman opposes this motion for extension of time.

/s/ Erin Hendricks
Erin Hendricks
Attorney for Defendant Annette Ward